



WSI

Weston Services, Inc.

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28 February 1991

BUREAU OF
FEDERAL CASE MANAGEMENT
MAR 03 1991

Mr. Edgar G. Kaup, P.E.
Case Manager
Bureau of Federal Case Management
Division of Hazardous Waste Management
New Jersey Department of Environmental Protection
5th Floor, 401 East State Street
Trenton, New Jersey 08625-0029

RE: **L.E. CARPENTER & COMPANY**
RESPONSE TO NJDEP COMMENTS TO RISK ASSESSMENT REPORT
NOVEMBER 1990

Dear Mr. Kaup:

WESTON Services, Inc. (WSI), on behalf of L.E. Carpenter & Company, has prepared the following responses to the New Jersey Department of Environmental Protection's (NJDEP) comments on the Draft Baseline Risk Assessment dated November 1990. These comments were contained in a letter from the NJDEP to L.E. Carpenter & Company dated 7 February 1991. Our responses are organized so as to address each NJDEP comment in the order presented in the 07 February 1991 letter.

RESPONSE TO GENERAL COMMENTS

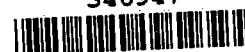
1. Data from the "Report of Supplemental Sampling Findings, November 1990" were used in calculating risk.
2. A table presenting the CRDLs used to calculate risk will be inserted into the report.

A discussion of the possible reasons that certain inorganics were found elevated in the groundwater, but not the soil samples will be inserted into the text.

Essential nutrients will remain in the risk assessment unless NJDEP receives consent from EPA to disregard those substances.

3. Additional sediment samples are currently being evaluated in response to comments to the supplemental RI.

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4. Surface water and sediment data were averaged and presented in Tables 6-3 and 6-4. An additional column will be inserted into Table 6-3 and 6-4 to indicate which samples were averaged.
 5. Additional sediment samples are currently being evaluated in response to comments to the supplemental RI.
 6.
 - a. The air pathway will be eliminated from the RA. A justification for this elimination will be added to the report.
 - b. Further delineation of potential groundwater receptors/users is currently being evaluated in response to the supplemental RI.
 - c. Worker scenario text will be modified so that the exposure assessment and risk characterization agree with respect to what is a present or future use scenario.
 - d. Exposure frequency, exposure duration, and the averaging time were used to calculate risk. Text will be added to reflect this point.
- "EPA Supplemental Guidance for Standard Exposure Factors, Final Draft, December 1990" was not available when this risk assessment was prepared.
- Inhalation of soil dust will remain as an exposure route, separate from the soil ingestion.
7. This number was omitted from the original comments.
 8. EPA guidance was followed in deriving dermal slope factors from oral slope factors. NJDEP will contact EPA, and in turn inform WESTON if the derived slope factors should remain in the calculations, or be replaced by oral slope factors.



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9. NJDEP guidance was used for dermal absorption factors. This guidance is no longer in use. NJDEP will contact EPA, and in turn inform WESTON how the dermal route should be handled.
10. The "Uncertainty Analysis" section of the RA will be expanded.

RESPONSE TO SPECIFIC COMMENTS

1. Non-targeted compounds will be addressed qualitatively in the uncertainty section.
2. NJDEP guidance was the basis for using the maximum detected concentration for quantitative characterization of risk. Since this guidance is now no longer being used, the RA will be modified, using the upper 95% confidence limit instead of the maximum detected concentration.
3. The New Jersey Natural Heritage Program will be consulted. If there are any rare/threatened species present in the area surrounding the site, text will be modified appropriately.
4. Upon review of the discussion of lead detected on site, we believe the text sufficiently addresses site conditions considering that lead was not utilized in any process at the facility.
5. Additional sediment samples are currently being evaluated in response to the supplement RI.
6. Conclusions on the impairment, or lack thereof, of the Rockaway River as New Jersey Trout Maintenance Waters (FW2-TM) will be added to the text. The uncertainty section of the ecological RA will be expanded.
7. The ER-L for mercury listed in the RA is incorrect due to a typographical error. Previous drafts of the text indicate that the correct value, 1.5E-01, was used and conclusions based on the ER-L value are correct as stated in the present text.



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8. A table will be added to Appendix A indicating the Koc values used to calculate the interstitial water concentrations, as well as the sources of the values.

If you have any questions, please contact me at (201) 225-3990.
Thank you,

Very truly yours,

WESTON SERVICES, INC.

David Henderson
Division Manager

DH/lis

cc: C. Anderson, L.E. Carpenter
R. Hahn, L.E. Carpenter
M. O'Neill, RFW